



125 Broad Street
New York, NY 10004
212.607.3300
www.nyclu.org

Alexis Karteron
Senior Staff Attorney
Direct line: 212.607.3391
akarteron@nyclu.org

April 11, 2013

VIA ECF

Honorable Sandra L. Townes
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Charles v. City of New York, 12-cv-6180 (SLT)(SMG)*

Dear Judge Townes:

On behalf of the plaintiff, who alleges that she was unconstitutionally arrested for videotaping police officers stopping and frisking several youths on a public sidewalk, I write to request leave to file an amended complaint in this matter. Mark Zuckerman, counsel for the defendants, has reviewed the proposed pleading and indicated that the defendants consent to its filing. The relevant background is set forth below.

On March 4, 2013, Mr. Zuckerman requested a pre-motion conference concerning the defendants' motion to dismiss the plaintiff's claims for declaratory relief pursuant Federal Rule of Civil Procedure 12(c). *See* Zuckerman Ltr. to Court, dated Mar. 4, 2013 (ECF 12). On March 8, 2013, Christopher Dunn, counsel for the plaintiff, wrote to the Court to explain that counsel for the parties had conferred and reached resolution of the defendants' concerns regarding the claims for declaratory relief. *See* Dunn Ltr. to Court, dated Mar. 8, 2013 (ECF 14).

If the Court grants the plaintiff's request for leave to amend, the amended complaint will be filed immediately. As the parties have agreed, the amended complaint excludes the declaratory relief claims and identifies a "John Doe" defendant.

Sincerely,

Alexis Karteron

c: Mark Zuckerman, Esq. (by ECF)
Counsel for Defendants